

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Orin Snyder
Direct: +1 212.351.2400
Fax: +1 212.351.6335
OSnyder@gibsondunn.com

June 4, 2021

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: Broidy et al. v. Global Risk Advisors et al., No. 1:19-cv-11861

Dear Judge Vyskocil:

We write respectfully on behalf of Defendants and with the consent of Plaintiffs to address the schedule in connection with Plaintiffs' June 1, 2021 letter request (Dkt. 98) and motion for leave to amend (Dkt. 95).

On April 16, 2021, the Court granted Plaintiffs' request for a 30-day extension of the time to seek leave to file an amended complaint. *See* Dkt. 93. On June 1, 2021, Plaintiffs filed a motion for leave to amend their complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. *See* Dkt. 95. Together with that motion, Plaintiffs submitted a letter requesting permission to submit an *ex parte* declaration for *in camera* review. *See* Dkt. 98. Defendants intend to oppose the motion for leave to amend and Plaintiffs' letter request.

Having conferred among counsel, and pending the Court's approval, the parties agree that Defendants' opposition to Plaintiffs' letter request (Dkt. 98) shall be filed on or before June 18, 2021, and that any reply by Plaintiffs shall be filed on or before June 21, 2021. Additionally, Defendants' opposition to Plaintiffs' motion for leave to amend (Dkt. 95) shall be filed on or before July 13, 2021, and any reply by Plaintiffs shall be filed on or before July 27, 2021.

This is Defendants' first request to re-set these deadlines. Granting these extensions would not affect any other deadlines in this action.

We thank the Court for its kind consideration.

Respectfully submitted,

/s/ Orin Snyder

Orin Snyder

cc: All counsel of record (via ECF)